

THOMAS E. FRANKOVICH (State Bar No. 074414)
 THOMAS E. FRANKOVICH,
A PROFESSIONAL LAW CORPORATION
 4328 Redwood Hwy., Suite 300
 San Rafael, CA 94903
 Telephone: (415) 444-5800
 Facsimile: (415) 674-9900

Attorney for Plaintiffs
 IRMA RAMIREZ and
 DAREN HEATHERLY

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

IRMA RAMIREZ and DAREN
 HEATHERLY,

Plaintiffs,

v.

ORIGINAL US RESTAURANT; 501
 COLUMBUS LLC; and TRINACRIA
 BROS., INC.,

Defendants.

CASE NO. CV-14-03244-JST

STIPULATION and ~~PROPOSED~~
 ORDER TO CONTINUE THE FURTHER
 CASE MANAGEMENT CONFERENCE

Plaintiffs IRMA RAMIREZ and DAREN HEATHERLY, and defendants 501
 COLUMBUS LLC; and TRINACRIA BROS., INC., by and through their respective attorney of
 record stipulate to continue the further Case Management Conference set for August 19, 2015, at
 2:00 p.m. for the following reasons:

1. **Whereas**, all defendants have been served with the summons and complaint, and
 defendants have answered plaintiffs' complaint; and
2. **Whereas**, the parties conducted the General Order 56 Joint Site Inspection on
 March 10, 2015; and
3. **Whereas**, plaintiffs filed a notice of need for mediation on June 18, 2015.

1 The case has been referred to mediation, and mediator, Eric Ivary has been assigned to the
2 matter;

3 4. **Therefore**, the parties respectfully request that the Case Management Conference
4 currently scheduled for August 19, 2015, at 2:00 p.m. be continued to sometime after the
5 mediation has been completed and/or to a date that is convenient to the Court.

6 **IT IS SO STIPULATED.**

7 This stipulation may be executed in counterparts and have the same force and effect as
8 though all signatures are on the same and/or consecutive pages. Photocopies and facsimile shall
9 have the same force and effect as originals.

10
11 Respectfully submitted,

12
13 Dated: August 12, 2015

14 THOMAS E. FRANKOVICH,
15 ***A PROFESSIONAL LAW CORPORATION***

16 By: ____/s/Thomas E. Frankovich____

17 Thomas E. Frankovich

18 Attorney for Plaintiffs IRMA RAMIREZ; and
19 DAREN HEATHERLY

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Dated: August 12, 2015

MARC LIBARLE

2 LAW OFFICES OF MARC LIBARLE

3
4 By: _____/s/Marc Libarle _____

5 Marc Libarle

6 Attorney for Defendants 501 COLUMBUS LLC;
7 and TRINACRIA BROS., INC.
8

9 ~~PROPOSED~~ ORDER

10 IT IS SO ORDERED that the Case Management Conference set for August 19, 2015,
11 at 2:00 p.m. is ~~vacated and/or~~ continued to November 18, 2015, at 2:00 ~~a.m./~~ p.m.

12 The parties shall file a Joint Case Management Statement no later than ^{ten court} ~~seven (7)~~ days prior to the
13 Conference.
14

15
16 Dated: August 17, 2015

